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Attorneys for Defendants  
NORTH COUNTY FIRE PROTECTION  
DISTRICT OF MONTEREY COUNTY and  
CHRIS ORMAN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JONATHAN RUSKELL,  
Plaintiff,

v.

NORTH COUNTY FIRE  
PROTECTION DISTRICT OF  
MONTEREY COUNTY, a public  
agency and/or municipal corporation;  
CHRIS ORMAN, individually and  
as Fire Chief; and DOES 1  
THROUGH 10,  
Defendants.

Case No. 15-cv-03540-BLF  
Hon. Beth Labson Freeman

**SECOND REVISED JOINT  
STIPULATION AND ~~PROPOSED~~  
ORDER REGARDING PROPOSED  
DISCOVERY AND PRE-TRIAL  
CUT-OFF DATES**

Plaintiff Jonathan Ruskell (“Plaintiff”) and Defendants North County Fire Protection District of Monterey County and Chris Orman (“Defendants”), by and through their attorneys of record (collectively “Parties”), submit this Joint Stipulation and Order regarding proposed discovery and pre-trial cut-off dates per this Court’s January 21, 2016 order.

WHEREAS, on January 21, 2016 this Court set the trial date, pre-trial conference, last day to commence mediation, and reserved a hearing date for Motion for Summary Judgement; and

Case No.: 15-cv-03540-BLF

SECOND REVISED JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING PROPOSED  
DISCOVERY AND PRE-TRIAL CUT-OFF DATES

WHEREAS, the Court has ordered the Parties to provide additional proposed discovery and trial related cut off dates.

NOW, THEREFORE, the Parties hereby agree and stipulate to the following pre-trial and trial related dates and propose the same for this Court's consideration:

### **PROPOSED SCHEDULE OF PRE-TRIAL AND TRIAL DATES**

<b>Matter</b>	<b>Proposed Date</b>
Last Day to Amend Pleadings or Add New Parties	2/29/2016
Fact Discovery Cut-Off	2/10/2017
Expert Disclosure (Initial)	6/9/2017
Expert Disclosure (Rebuttal)	7/14/2017
Expert Disclosure (Sur Rebuttal)	7/28/2017
Expert Discovery Cut-Off	8/11/2017
Hearing Date for Motions for Summary Judgment*	10/19/2017 at 9:00 A.M.
Cut-Off for Hearings on Non-Dispositive Motions (Discovery Motions)	9/7/2017
Final Pretrial Conference*	1/11/2018 at 1:30 P.M.
Trial – (5 days)*	2/5/2018 at 9:00 A.M.

\*These dates have been set pursuant to the Court's Case Management Order entered 1/21/2016.

1 Dated: February 18, 2016

Respectfully submitted,

2 FORD & HARRISON LLP

3  
4 By: /Allison V. Saunders/

5 Allison V. Saunders

6 Lauren T. Williams

Attorneys for Defendants

7 NORTH COUNTY FIRE PROTECTION  
8 DISTRICT OF MONTEREY COUNTY  
and CHRIS ORMAN

9 Dated: February 18, 2016

ADAMS, FERRONE AND FERRONE APC

10  
11 By: /Samantha M. Swanson/

12 Samantha M. Swanson

Attorneys for Plaintiff

13 JONATHAN RUSKELL  
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**~~PROPOSED~~ ORDER**


The Court having reviewed the Parties' Joint Stipulation and [Proposed] Order regarding proposed discovery and pre-trial cut-off dates, ORDERS that the following discovery and pre-trial cut-off dates be established:

Matter	Proposed Date
Last Day to Amend Pleadings or Add New Parties	2/29/2016
Fact Discovery Cut-Off	2/10/2017
Expert Disclosure (Initial)	6/9/2017
Expert Disclosure (Rebuttal)	7/14/2017
Expert Disclosure (Sur Rebuttal)	7/28/2017
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Final Pretrial Conference*	1/11/2018 at 1:30 P.M.
Trial – (5 days)*	2/5/2018 at 9:00 A.M.

\*These dates have been set pursuant to the Court's Case Management Order entered 1/21/2016.

IT IS SO ORDERED.

Dated: February 19, 2016

  
 Hon. Beth Labson Freeman  
 United States District Judge